

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

C. M. COLLINS, N. J. LUNDY, and R. §
C. L. MAYS, individually, and on behalf §
of all others similarly situated, §

Plaintiffs,

v.

CATASTROPHE RESPONSE UNIT, §
INC. and CATASTROPHE RESPONSE §
UNIT USA, INC., §

Defendants.

NO. 4:22-CV-1073-SDJ

PLAINTIFFS' MOTION FOR NOTICE

ORAL ARGUMENT REQUESTED

ORDER ON PLAINTIFFS' MOTION FOR NOTICE

On this the ____ day of _____ came on to be heard Plaintiffs' Motion for Notice. After considering the pleadings and evidence on file, as well as the arguments of counsel, it is the opinion of this Court that the Motion for Notice has merit and should be granted.

Therefore, Plaintiffs' Motion for Notice is hereby GRANTED and the following is hereby ORDERED:

1. Within 14 days of the date of this Order, Defendants shall provide Plaintiffs an Excel (.xls) file containing the names of all desk adjusters who performed work for either Defendant in the United States at any time on or after December 27, 2019 and who were paid on a 1099 basis, as well as all of each individual's (1) home and addresses known to Defendants, (2) email addresses known to Defendants, (3) telephone numbers (home, mobile, etc.) known to Defendants, and (4) beginning and ending dates of the individual's working relationship with Defendants.

2. Plaintiffs are granted leave to send the Notice approved by this Court and attached as Exhibit A to this Order to each such individual, via the home/mailling address(es), via the email address(es), via text to the telephone number(s) provided by Defendants.

3. Plaintiffs shall send such Notice within 30 days of receipt of the Excel file identified in Exhibit 1 and shall notify Defendants of the date that such Notice is sent.

4. Each recipient of such Notice shall have 60 days from the date that Plaintiffs mail such Notice to return their Consent to Join form to Plaintiffs and have Plaintiffs file such Consent with the Court. If the 60th day falls on a Saturday, Sunday, or federally recognized holiday, such deadline shall be extended to the following business day.

5. Plaintiffs' counsel may not call a potential class member unless Plaintiffs' counsel receives notice that a Notice sent to such individual was returned to Plaintiffs' counsel as undeliverable.